

United States District Court
For The Northern District of New York

PLAINTIFF'S EXHIBIT LIST

Case No. 20-CV-01194

Date: June 10, 2024

Presiding Judge: Hon. Frederick J. Scullin

(X) Plaintiff () Defendant () Court

Exhibit No.	Marked for Identification	Admitted Into Evidence	Remarks	Witness	Exhibit Description
P-1					Jefferson County Sheriff's Office Corrections Division Policy on Individual Searches (Effective Date: November 27, 2014) (Cnty. Def. - 000248-254)
P-2					Jefferson County Sheriff's Office Corrections Division Policy on Individual Searches (Effective Date: November 1, 2017) (Cnty. Def. - 000236-245)
P-3					State Commission of Correction Lesson Plan for the Training on "Handcuffing and Inmate Searches" (Dated: January 27, 2003) (Cnty. Def. - 000273-295)
P-4					Jefferson County Jail Staff Assignment Duty Form (Dated: September 28, 2017) (Cnty. Def. - 000073)

Exhibit No.	Marked for Identification	Admitted Into Evidence	Remarks	Witness	Exhibit Description
P-5					DeAnna LeTray's Jefferson County Sheriff Receipt for Property Returned (Dated: 9/28/2017) (Cnty. Def. - 000083)
P-6					Jefferson County Sheriff's Office Correctional Facility Inmate Property (Dated: September 28, 2017) (LeTray000045)
P-7					Blank Jefferson County Jail Intake Forms (Cnty. Def. - 000065-70)
P-8					Jefferson County Sheriff's Office Code of Conduct (Dated 2020) (Cnty. Def. - 000299-343)
P-9					Watertown Police Departmental Order on Prisoner Booking (V1/A3/S90.55-90.58) (W161-164)
P-10					Watertown Police Departmental Order on Biased-Based Enforcement (V1/A3/S42.00) (W - 194-199)
P-11					Watertown Police Departmental Order on the Search of Prisoners (V1/A3/S90.55-90.58) (W-162-163)
P-12					DeAnna LeTray's Social Security Administration Benefit Verification Letter (Dated: March 29, 2021) [REDACTED] (LeTray000482-487) (Confidential)
P-13					DeAnna LeTray's 2018 Income Tax Return [REDACTED] (LeTray 000367-389) (Confidential)

Exhibit No.	Marked for Identification	Admitted Into Evidence	Remarks	Witness	Exhibit Description
P-14					DeAnna LeTray's W-2 Forms from TiffCo Industries [REDACTED] (LeTray000411-414) (Confidential)
P-15					DeAnna LeTray's Payment History [REDACTED] (LeTray000415-426) (Confidential)
P-16					DeAnna LeTray's Booking Photos (W - 406-408)
P-17					Watertown Police Departmental Policy on Courtesy (V1/A1/S.05.01) (Dated: November 3, 2003) (W - 405)
P-18					DeAnna LeTray's 2019 Income Tax Return [REDACTED] (LeTray 000390-410) (Confidential)
P-19					WPD Officer Complaint Form, Disposition, and Memorandum dated October 15, 2020 (W-288-313)
P-20					WPD Memorandum statement by George Cummings dated 7/12/20 (W- 323-324)
P-21					WPD statement by George Cummings dated 7/20/20 (W-325- 330)
P-22					Curriculum Vitae of Dr. Randi Ettner (2024)
P-23					County Defendants' Response to Plaintiff's First Request for Admissions (Dated: July 15, 2022)

Exhibit No.	Marked for Identification	Admitted Into Evidence	Remarks	Witness	Exhibit Description
P-24					County Defendants Supplemental Response to Plaintiff's First Request for Admissions (Dated: September 6, 2022)
P-25					Watertown Police Department's Response to Plaintiff's First Request for Admissions (Dated: July 27, 2022)
P-26					Watertown Police Department's Supplemental Response to Plaintiff's First Request for Admissions (Dated: August 22, 2022)

PLEASE TAKE NOTICE that Plaintiff reserves the right to supplement this Exhibit List as necessary and as required, up to the date of trial.

Dated: June 10, 2024
New York, New York

Respectfully submitted,

/s/ Jessica Perry
Jessica Perry (702461)
Robert Hodgson (518648)
Veronica Salama (703812)
Molly K. Biklen (515729)
Attorneys for Plaintiff
NEW YORK CIVIL LIBERTIES UNION
FOUNDATION
125 Broad Street, 19th Floor
New York, New York 10004
Tel: (212) 607-3300
Fax: (212) 607-3318
E-mail: jperry@nyclu.org

/s/ Joshua Cotter
Joshua Cotter (518217)
Samuel C. Young (508916)
Attorneys for Plaintiff
LEGAL SERVICES OF
CENTRAL NEW YORK, INC.
221 South Warren Street, 3rd Floor
Syracuse, New York 13202
Tel: (315) 703-6500
Fax: (315) 703-6520
E-mail: jcotter@lscnny.org